

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF TEXAS – CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA

Vs.

Case No. 2:20-CR-01217

Sofia Tijerina, et al

UNOPPOSED MOTION FOR RELEASE OF MATERIAL WITNESSES

COMES NOW, Alicia G. Cuellar, Attorney for the material witnesses in the above-captioned case, **Plutarco Gonzalez-Reyes and Jesus Utrera-Abertano**, (hereinafter referred to as “material witnesses”) and moves this Honorable Court for the release of the material witnesses from the custody of the U.S. Marshal Service and into the custody of the Bureau of Immigration and Customs Enforcement in support thereof would show the following:

On February 24, 2021, both material witnesses were depose in person by **AUSA Amanda Gould** and defense counsel, **Carlos Omar Reyna**.

The co-defendant, **Ivar Cantu** pled guilty on February 1, 2021 before **US Magistrate Judge Jason B. Libby**.

The material witnesses have no other pending charges known or anticipated by the government.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully moves the Court for the release of Material Witnesses, **Plutarco Gonzalez-Reyes and Jesus Utrera-Abertano** into the custody of the Bureau of Immigration and Customs Enforcement.

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Respectfully submitted,

/s/ Alicia G. Cuellar

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CERTIFICATE OF SERVICE

I, Alicia G. Cuellar, do hereby certify that on February 25, 2021 a true and correct copy of this Motion was sent by email to AUSA, Amanda Gould and to defense counsel, Carlos Omar Reyna and Frank Morales

/s/ Alicia G. Cuellar

Alicia G. Cuellar

Attorney for Material Witnesses

CERTIFICATE OF CONSULTATION

On February 25, Movant did consult with AUSA, Amanda Gould and US Public Defender, Frank Morales and defense counsel, Carlos Omar Reyna all stated to they were unopposed to the release of the material witnesses.

/s/ Alicia G. Cuellar

Alicia G. Cuellar

Attorney for the Material Witnesses

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**ORDER GRANTING UNOPPOSED MOTION FOR THE
RELEASE OF MATERIAL WITNESSES**

The Court having considered the material witness' attorney, **Alicia G. Cuellar's** Unopposed Motion for the Release of the Material Witnesses, **Plutarco Gonzalez-Reyes and Jesus Utrera-Abertano** and find the material witnesses in this case should be released from the custody of the United States Marshal Service and be delivered to the Bureau of Immigration and Customs Enforcement. Further, the material witnesses have no pending charges known or anticipated by the government.

IT IS THEREFORE ORDERED that the material witness, **Plutarco Gonzalez-Reyes and Jesus Utrera-Abertano**, be released forthwith from the custody of the U.S. Marshal Service and into the custody of the Bureau of Immigration and Customs Enforcement.

IT IS FURTHER ORDERED that the Clerk of the Court shall provide a copy of this order to the United States Marshal Service.

SIGNED AND ORDERED at Corpus Christi, Texas on this the _____ day of _____, 2021.

JUDGE PRESIDING